

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

JANICE HARGROVE WARREN

PLAINTIFF

v.

No. 4:19-cv-00655-BSM

MIKE KEMP, et al.

DEFENDANTS

DEFENDANTS' UNOPPOSED MOTION FOR VIRTUAL ATTENDANCE

Comes now Defendants, Mike Kemp, Linda Remele, Shelby Thomas, Alicia Gillen, Eli Keller, Brian Maune and the Pulaski County Special School District ("PCSSD" and/or "District") (collectively, "District Defendants"), by and through their attorneys, Bequette, Billingsley & Kees, P.A., and for their Motion for Virtual Attendance, state:

1. Dr. Carl Davis was a consultant for Ray and Associates Executive Leadership Search in 2018 and was a boots on the ground representative who conducted the PCSSD superintendent search at issue in this case.

2. Defendants wish to call Dr. Davis as a witness in their case-in-chief. Dr. Davis has personal knowledge of facts and information that are material to the case.

3. Dr. Davis currently lives in the Dominican Republic, where he will be domiciled when the Defendants anticipate their case-in-chief will begin. Dr. Davis has agreed to make himself available for trial through the Court's virtual platform, if allowed. Dr. Davis routinely uses virtual webinar type platforms and is familiar with the process.

4. Given that Dr. Davis will be domiciled in a foreign country when he is expected to be called as a witness, Defendants request this Court to permit Dr. Davis to be allowed to appear through virtual means.

5. Defendants have conferred with counsel for the Plaintiff, and she does not oppose this request.

WHEREFORE, Defendants prays that this Court grant Defendants' Motion for Virtual Attendance be granted.

Respectfully submitted,

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